

Bureau of Land Management (BLM)
Western Oregon Plan Revisions (WOPR)
P.O. Box 2965
Portland, Oregon 97208

December 3, 2007
revised 12/17/2007

Subject: WOPR DEIS Comments

Dear Bureaucrats,

I have read through the three volumes of the WOPR Draft Environmental Impact Statement and appreciate the colorful graphics and maps. However, no matter how much lipstick is put on a "corporate pig" it is still a "corporate pig".

It would be helpful to include "disclose" in the Glossary. Disclosing under NEPA means that BLM is required to tell the truth to the public. However, rather than disclosure, the BLM has provided "obfuscation". The Glossary should also include "arbitrary", "capricious", and "abuse of discretion" because those are the standards upon which the courts will judge the WOPR.

The following terms should also be defined in the Glossary: average historic condition, allowable sale quantity, county payments, ecocide, eco-tourism, existing old forest, existing very old forest, global climate change, harmonizing, legacy forest, logging, native forest, natural condition, off-highway vehicle, off-road vehicle, old-growth forest, regulated condition, sales tax, soil erosion, stumpage, sustain, timber corporation subsidy, timber interests, tourism, tree farm, Universal Soil Loss Equation, and wilderness forest. The WOPR frequently invokes sustained yield, sustainable timber supply, sustainable harvest levels, and permanent forest production without defining sustain. Sustain means to keep in existence or prolong.

For context, the WOPR should disclose that the management history of western Oregon forests is a legacy of abuse replete with criminal activity. In 1866 the Oregon and California Railroad Company started building the O&C railway and promptly violated all three conditions placed on the disposal of the granted forestland. Instead of obeying the law the company sold off the gigantic timber to the highest bidders. The Southern Pacific Railroad, which bought the O&C Railroad Company and finished the railway in 1887, ceased selling the land to settlers altogether in 1903 because of the increasing value of the old-growth timber. When this was discovered the State of Oregon was furious because they were interested in seeing the land settled and not sold off to timber interests. Newly elected President Theodore Roosevelt, as part of his plan of progressive reforms, vowed in 1903 to "clean up the O&C land fraud mess, once and for all!" Over the next two years, Roosevelt's investigators collected evidence, and over 1,000 politicians, businessmen, railroad executives and others were indicted. Many were eventually tried and convicted on charges including fraud, bribery and other corruption. The Federal government sought return of the grant lands from the railroad not actually part of the right of way for the railroad line itself. The U.S. Congress eventually passed a resolution that revested those lands into Federal ownership. The railroad then sued and legal battles continued for many years until the case eventually made its way to the Supreme Court. In 1915 the high court ruled that Southern Pacific had to return most of those lands back to the United States and enjoined any further land sales. The Supreme Court left it to Congress to figure out what to do with the land. Congress passed the Chamberlain-Ferris Act in 1916 and the O&C Act in 1937, putting the management of these forests into the hands of the General Land Office (BLM after 1946). The Federal timber sale program began in earnest with the

post-World War II housing boom. The western Oregon BLM Districts facilitated logging by administering timber sale contracts. The logging of the Pacific Northwest's ancient forests is legendary, in 50 years over 80% of the old-growth was leveled. Logging reached a feverish pitch in the 1980s, leaving many damaged watersheds, boomed then busted rural economies, and a monoculture of tree plantations dominating a once lush landscape of old-growth forests.

It is the duty of the BLM to represent the interests of the many honest American citizens, and not the special interests of the few politically well connected corporate criminals and neo-robber barons. As everyone knows, the Bush crime family (BCF) is a cabal of earth raping bastards (ERBs). ERBs believe in ecocide for fun and profit, and they routinely violate and oppose environmental laws. The WOPR should be based on the best science available and existing laws, but not on political favors. However, it appears that the WOPR is just another chapter in the O&C lands criminal history.

The WOPR has not made a case showing that the Northwest Forest Plan (NWFP) is invalid on O&C lands. Therefore, the No Action alternative should be the Preferred alternative. It is stated in the WOPR that it will comply with the National Environmental Policy Act (NEPA), Endangered Species Act, and the Clean Water Act; and yet nowhere is it explained how that will be accomplished. The NWFP has already been judged to be minimally legal by the courts. If the WOPR were to be approved what changes in the NWFP would be required?

The No Action alternative is not correctly represented in the WOPR. On page 4 it states that the allowable sale quantity (ASQ) under the NWFP is 211 mmbf but that only 40% to 70% was offered for sale. Therefore, the No Action alternative should be represented as about 116 mmbf (55% of 211 mmbf). It is also stated that the 211 mmbf ASQ was not met due to legal issues. However, those legal issues are due to the BLM getting caught by the courts violating Federal laws. Even with the reduced logging rate under the NWFP the endangered and threatened species populations and habitats are still declining. Therefore, the sustainable logging rate may be an ASQ that is less than the actual level under the NWFP.

The BLM should disclose that the true Purpose and Need of the WOPR is to pay back the ERBs who support and fund the BCF. The BLM should disclose that the BCF intends to transfer public forest assets to a few rich timber barons in order to satisfy their unlimited greed by liquidating the remaining legacy forests. The WOPR should disclose the total campaign contributions made by timber corporation representatives to the BCF since 2000.

Regarding legal matters, the BLM should disclose all of the lawsuits that the agency has lost in the past 10 years relating to forestry projects in the Pacific Northwest. The BLM should also disclose all of the Federal laws that the courts have found that the BLM violated. An October 30, 2007 article in the Grants Pass Daily Courier describes how the BLM has been caught violating many laws. Unfortunately, history shows that BLM has been operating as a criminal organization in western Oregon for many decades. An update on the legal status of the Aquatic Conservation Strategy would be useful in the WOPR. The BLM should disclose why the out-of-court settlement agreement between the BCF and timber industry groups was arranged rather than allowing the Department of Justice to defend the United States in court. The BLM should disclose which members of the BCF negotiated the sweetheart settlement agreement with their corporate masters.

A fundamental failure of the WOPR is incorrectly defining sustainability. In ecology sustaining means conserving an ecological balance by avoiding depletion of natural resources. Sustained yield is a level of exploitation or crop production that is maintained by restricting the quantity harvested to avoid long-term depletion. Sustainable forestry should remove the “interest” and leave the “principle”. The O&C Act specifies “sustained yield” and “permanent forest production”, but not “regulated tree farms”. Instead, the WOPR is focused on converting the permanent forests into tree farms (regulated stands) by liquidating the “principle”. In other words the WOPR is about eating the “seed corn”, therefore it violates the intent of the O&C Act.

For any renewable natural resource program such as logging, irrigation, grazing, farming, fishing, or hunting, a smaller harvest is always more sustainable. This concept is easy to understand for water projects developed for irrigation. The larger that an irrigation project service area is, the more severe drought shortages and impacts will be. In the same way for logging, the smaller that an ASQ is, the more sustainable it is.

If logging were truly practiced in a sustainable manner, then the character of the native forests would not significantly change and late-successional forest would occupy more than two-thirds of the planning area. For example, only 0.33% of the 300-year-old trees can be sustainably logged each year (1yr/300yr). In order to determine a sustainable logging rate the population of species by age class per acre needs to be known. If for example there are ten 300-year-old trees per acre, then only one 300-year-old tree can be sustainably logged from each 30 acre block of forest land each year ($0.33\%/\text{year} \times 10 \text{ trees/acre} \times 30 \text{ acres}$). By definition a human generation is 30 years. Therefore, each human generation is entitled to log no more than 10% of the 300 year old trees or 5% of the 600 year old trees. What percent of the old-growth forests have been liquidated during the past three generations? Does the BLM believe that it is sustainable forestry for three generations to steal old-growth trees from the next many generations?

Developing a sustainable forestry plan will require a different type of analysis than what is used in the WOPR. First, the BLM needs to honestly and publicly admit that forestry as traditionally practiced by the BLM, USFS, and the timber industry has been a pitiful failure resulting in damaged lands, watersheds, rivers, fisheries, habitats, communities, and increased fire hazard and severity. The NWFP is an attempt to move towards sustainable ecological forestry, and away from regulated forestry that is based on the false assumption that old-growth trees are decadent. The BLM should not move backwards, but it should move forward under the direction of the NWFP and drop the WOPR effort. In addition sustainable forest management does not require planting, fertilizing, or pesticide applications. Seed orchards are not needed when forestry is properly practiced because natural reseeded will match sustainable logging rates. Also, the naturally reseeded genetics are superior to seed orchard genetics and less costly to produce and deploy. The BLM clear-cutting plan is incorrectly focused on exploiting only a few forest species. What is the market value of hard wood trees compared to conifer trees? What species are identified in the O&C Act for harvest?

The WOPR reveals that BLM intends to increase soil erosion, increase flood frequencies and peaks, reduce summer stream flows, reduce flows from springs, reduce groundwater levels, reduce water quality, increase stream water temperatures, increase fire severity, reduce fire resiliency, reduce the habitat and populations of threatened and endangered species, reduce riparian corridors, increase insect infestations, accelerate the spread of noxious weeds and Port-Orford cedar root disease, reduce tourism, increase county welfare payments, and give more money to rich Republicans. How is it possible for all of the WOPR alternatives to be sustainable?

The truth is that none of the WOPR alternatives are sustainable. The WOPR computer models simply estimate growth versus harvest rates for 80 to 100 year old regulated forest rotations. The BLM should rewrite their computer models in order to calculate an ASQ that maintains the old-growth forest characteristics, isn't that what the NWFP did? Just because the BLM thinks that the NWFP ASQ is too low doesn't make it so, and is not a reason to conspire with the timber corporations to develop a clear-cutting plan.

On page LII, how can it be stated that Alternative 2 is the most favorable to local economies when the tourism values and quality of life were ignored?

On page LIII, in Table 2 how can No Action have a negative economic impact? By definition, No Action should have a zero impact.

On page LIV, what percent of the project lands have already been cut over?

On page LV, How can all of these different ASQs be sustainable? Figure 4 should show the actual sustainable ASQ, which is less than the No Action ASQ. Why will both the harvest and non-harvest land bases be harvested? How big will the thinned trees be?

Page LIX, Figure 6 and Table 4, show Alternative 3 anyway, the zeros make a point. Why does the BLM want to prevent spotted owl habitat from increasing?

Page LX, Table 5, show the actual figures for Alternative 3, it makes a point.

Page LXII, the discussion of fire severity and fire hazard is not believable.

Page LXIII, why is the BLM so interested in providing additional OHV areas? The WOPR should disclose which OHV interests met with the BLM to promote OHV use. The WOPR should also disclose the total campaign contributions made by the OHV lobby to the BCF since 2000.

Page LXIV, how is it possible for BLM to claim that soil productivity would be maintained or improved with the WOPR? The BLM should use the Universal Soil Loss Equation to calculate soil erosion rates.

Page 3, the true Purpose and Need is to provide a payback to the ERBs that support the BCF. The WOPR does not present any valid reason to abandon the NWFP.

Page 4, not achieving the planned logging levels under the NWFP is not a reason to develop the WOPR. Instead the BLM should just do a better job of implementing the NWFP. This is however typical of the BLM history, don't obey the law, get caught breaking the law, blame the environmental patriots, and then change the rules. If the planned logging rates are not being achieved under the NWFP, then the No Action alternative should be the actual NWFP ASQs as implemented (40% to 70% of planned). Using the wrong No Action alternative in the WOPR violates NEPA.

Page 5, the BLM claims substantial uncertainty in meeting desired logging rates. This is because the BLM inflated the ASQ. If the BLM would lower its artificially high ASQ, then logging rates would be more sustainable and predictable.

Improving the GIS resolution doesn't change anything unless the data density is also increased. The WOPR should present a map that shows where the new data is located within the planning area.

It is interesting that in 1995 the BLM "erred on the side of caution" and that in 2007 "that margin of error is no longer justified". What margin of error is used in the WOPR, or does BLM now just "throw caution to the wind"? Why does the BLM believe that "throwing caution to the wind" is consistent with the principles of adaptive management and yet at the same time the WOPR eliminates the adaptive management areas?

How is it that in 1994 the NWFP's ASQ was lowered from 958 mmbf annually to 805 mmbf annually due to more accurate mapping of riparian reserves (August 2003 BLM Settlement Information), and now in 2007 the ASQ is being increased due to more accurate mapping of riparian reserves? Is this an example of BLM being capricious?

Page 6, why does the BLM want to clear-cut critical habitats? What does harmonizing the BLM RMPs mean?

How can increasing the level of timber production be consistent with the principles of sustained yield when it is clear from the conditions of BLM forests that during past decades logging rates have been excessive? To be sustainable the historic logging rates need to be dramatically reduced.

Page 8, BLM has not shown that the NWFP needs to be changed. The NWFP can provide a sustainable timber supply. Just because those logging rates are less than what the BLM would like, doesn't mean anything is wrong other than BLM's perspective. Instead of the BLM misrepresenting the concept of sustainable yield, it would be better for the BLM to use its budget for better land management. Why does the BLM want to clear-cut lands that are "incompatible with programmed, sustained timber harvest" according to the NWFP? The BLM should just honestly admit that they have greatly over estimated the sustainable yield.

Page 9, what does harmonizing laws mean, is that when the BLM substitutes its interpretation of the laws for the court's opinions?

If the O&C Act was intended to halt previous practices of clear-cutting, why does the BLM now want to increase clear-cutting? By the way, the "boom and bust" cycles were caused by the business cycle and not by the unsustainable logging rates.

Page 10, the O&C Act specifies permanent forest production, sustained yield for a permanent timber supply, protecting watersheds, regulating stream flow, contributing to the economic stability of local communities and industries, and recreation. Assigning timber the dominant use does not mean that logging is to be conducted in a manner that excludes all other authorized uses. In addition, compliance with all environmental laws is still required for any O&C lands management plan. The annual sustained yield capacity is a maximum, not an annual requirement. The O&C Act provides for less timber being sold if the market is down. The WOPR does not disclose the statistical indices in their computer model such as the standard deviations and r-squared values, and the BLM did not reduce its calculated ASQs for uncertainties or safety factors. Therefore, the calculated ASQs in the WOPR are not sustainable and violate the O&C Act.

Page 15, the 406,600 acres of public domain and other lands should not be included in the WOPR land base. The GIS should have sufficient resolution to separate the O&C lands, public domain lands and other lands. Is the BLM trying to pad the total acreage of the land base to increase the ASQ?

Page 17, the cumulative effect analysis should include adjacent private lands. As stated in the WOPR, the BLM typically manages only a small percentage of any fifth-field watershed. Therefore, it is even more important for those watersheds that the BLM lands be left intact as old-growth forests and not liquidated.

Pages 22 and 23, why does the BLM want to eliminate the Survey and Manage Mitigation Measure Standards and Guidelines? Why does the BLM want to eliminate the Aquatic Conservation Strategy? The WOPR should disclose that in April, a Federal Court ruled that the BCF acted illegally by suppressing scientific dissent when it illegally modified environmental safeguards, known as the Aquatic Conservation Strategy, developed in 1994 as part of the NWFP. Those attempted revisions were one of five measures the BCF agreed to pursue at the suggestion of the American Forest Resource Council, a timber-industry group, to increase logging. *"This is a story about how our federal government went to work to payback the timber industry at the expense of west coast salmon stocks and communities that rely on them," said Earthjustice attorney Patti Goldman. "In the end the government wasted millions of dollars in staff and attorney time all for nothing. We were able to keep the salmon protections in place because the government couldn't get any reputable scientist to go along with their scheme."* The BCF tried to weaken the salmon protections to repay a promise made to the timber industry neo-robber barons who contributed more than one million dollars to the Republican campaign committee after meeting with George W. Bush in May 2000. Why does the BLM want to increase the ASQ beyond the intent of the O&C Act? Why did the BLM violate the law and try to cheat? Why is the BLM trying to replace the NWFP instead of amending the NWFP? How will the NWFP need to be changed if the WOPR is approved?

Page 29, the NWFP has been amended since 1995 and can be amended again, so why is the WOPR being proposed?

Page 50, the OHV designations should be reduced and not expanded. OHV use only serves to damage the public resources in numerous ways and has no redeeming values. Is there enough private land to provide for that activity? What is the difference between OHVs and ORVs? In October 2007 Wildlands CPR won a FOIA lawsuit against the USFS to release its information about the damage to public lands caused by OHVs. The WOPR should disclose all of the damage to the public resources that has occurred and that will occur on BLM lands by OHVs.

Page 51, what is the failure rate of reforestation on BLM project lands?

Page 52, how is it that clear-cuts will not attract attention?

Page 57, how will clear-cuts, reducing riparian corridors, and more road construction maintain and restore water quality?

Page 61, protection of all species is part of sustained forest yield. The public domain land should not be part of the WOPR land base.

Page 64, how is it possible that Preferred Alternative will result in what is claimed?

Page 65, how can drastically increasing logging to unsustainable levels increase fire resiliency, increase spotted owl and marbled murrelet recovery, and speed forest development? The BLM should disclose how many laws they were found to have violated by the courts in its failed attempt to gut the Survey and Managed standards and guidelines and the Aquatic Conservation Strategy.

Page 75, the 7% pie slice is not identified in the legend.

Page 107, rejecting the Natural Selection Alternative (NSA) is arbitrary and capricious. How is it that the BLM accepted the NSA as meeting the Purpose and Need for a portion of the South Deer Landscape Management Project (on O&C Lands) and not for the WOPR? The NSA is based on sustainable yield principles, and is suitable on steep lands. The WOPR is simply wrong in its description of the NSA. The NSA is not prohibitively expensive in financial and environmental terms. The fact of the matter is the exact opposite as demonstrated at the many locations in the Pacific Northwest where the NSA has been successfully employed for decades. The WOPR clear-cutting plan is however prohibitively expensive in both financial and environmental terms.

The WOPR states that the No Old-Growth Harvesting alternative would not meet the Purpose and Need. The O&C Act does not require the liquidation of old-growth trees. This statement shows that the true Purpose and Need of the WOPR is to liquidate old-growth forests.

Page 112, Table 40, the change in cumulative jobs under the No Action Alternative should be zero by definition. How is it possible for all of the different ASQs to be sustainable?

Page 113, Table 40, how is it possible that all of the alternatives will improve shading when the riparian areas will be heavily logged in all of the action alternatives?

Pages 139 - 144, why are the Medford OHV emphasis areas being expanded under Alternative 2? OHV activities can only cause great damage to public lands and is not sustainable. The BLM lands should be closed to these activities except in very limited areas. The BLM should coordinate the designation of OHV areas with the State, USFS, counties, and cities. The BLM should disclose how the demand for OHV areas was determined. Did the BLM determine how far houses are from the OHV areas? How did the BLM use the Oregon Parks and Recreation Department's "Statewide Comprehensive Outdoor Recreation Plan" to determine the future demand for OHV areas?

Page 184, Figure 11, the public domain lands and other lands should not be included in the WOPR land base.

Page 185, Figure 12, the brown areas are clear-cuts and not simply harvest units.

Page 189, the lands adjacent to BLM lands should be included in the cumulative effects analysis. What percent of those adjacent lands have been clear-cut?

Page 194, why did the BLM change from the NWFP forest stage terminology to the WOPR structural stage terminology? That seems to be arbitrary and capricious. What was the long-term average high percent of the region in late-successional forest?

It appears that the actual logging rates (a rate of logging of late-successional forest far below the amount anticipated in the NWFP) under the NWFP will sustain only about half of the long-term average historic late-successional forest. Less logging would sustain more late-successional forest. The WOPR is not based on permanent forest production, but on converting the character of the late-successional forest into regulated tree farms.

Page 198, Table 65, a new table should be created to show the approximate number of trees per acre by 50 year age classes and species for each structural stage subdivision.

Page 201, create two new figures that show existing old forest and existing very old forest.

Page 202, since the BLM has inadequate information on existing structurally complex forests how were the ASQ computer programs validated? Maybe more data is needed before the WOPR is completed.

Page 203, how is the 60% to 70% divided between mature, developed structurally complex, existing old forest, and existing very old forest?

Page 207, Table 66, the mature, developed structurally complex, existing old forest, and existing very old forest stages should be shown separately in the columns and pie charts.

Page 209, why is the database too large for computing if the GIS system is new and improved? How much of that data did the BLM ignore?

Page 210, Tables 67 and 68, the mature, developed structurally complex, existing old forest, and existing very old forest stages should be shown separately.

Page 211, if the late-successional forests have been highly fragmented by logging, how can increased logging be sustainable forestry?

Pages 211-214, the average historic forest conditions discussion should separate the mature, developed structurally complex, existing old forest, and existing very old forest stages.

Page 212, it is notable that the BLM considers climate change to be a factor in forest health.

Page 216, why is tourism not factored into the socioeconomics analysis?

Page 220, Table 70, it appears that the Secure Rural Schools and BLM effects are not significant as it is less than 1%.

Page 232, why was the effect of a county sales tax not considered in the WOPR? Josephine County is now discussing a 2% sales tax. Local taxing decisions do not justify unsustainable logging. Clear-cutting timberland on western Oregon BLM land will not correct inappropriate county taxing policies.

Page 233, the saw timber inventory and logging rates should be reported on a per acre basis. The historic logging levels shown in Figure 35 are not sustainable. Figure 35 should have a line showing the sustainable logging level, perhaps at 2,000 mmbf. It is obvious that logging BLM land can only marginally affect the local economies (3.4%).

Page 234, Figure 36, if the stumpage prices were doubled they would still be low. What is the reason to provide welfare to the timber corporations? The subsidy would appear to be about \$600/mbf.

Page 238, Figure 40, the total mill capacity during those years should be shown.

Page 239, Figure 41, there does not appear to be a problem with timber production due to the NWFP.

Page 240, Figure 43, there does not appear to be a problem with plywood production because it is offset by OSB production.

Page 241, Figure 44, if logs can be exported then there must not be a log supply problem. The BLM should disclose the names of the timber buyers and timber industry representatives who were at the gathering. The BLM should also disclose the amount of campaign money that those buyers and representatives donated to the BCF.

Page 243, Figure 46, the total employment in Oregon as well as the tourism employment should also be displayed on the graph. How much of the employment loss in the forest products industry is due to changes in technology?

Page 247, why does the analysis of standing volume and growth not consider age class and forest character? Is the BLM claiming that all growth is equivalent? If that is the case then why doesn't the BLM liquidate young trees instead of old trees? The evidence that cutting has exceeded growth and sustained yield is that the character of the forests has been grossly degraded during past decades.

Page 248, Figure 51, the bar graph should be redone to show the acres by broad 50 year age classes up to 500 years for both the current and natural conditions.

Page 249, if managed stands have higher volumes of timber per acre won't the fire hazard increase? How can it be claimed that the genetics will be improved if species composition is reduced? How can it be claimed that seeds from seed orchards have better genetics than what nature produces?

Page 258, if over 1,600 new rare plant populations were found in just three years in the planning area, then maybe the surveys should continue until new populations are no longer found. Why does the BLM want to log before rare plant populations are found and can be protected?

Page 260, the BLM should continue surveying the planning area until all suspected special status plant and fungi species are documented.

Page 263, recovery plans for all Federally listed species in the planning area should be written before the WOPR is completed.

Page 268, what percent of the invasive species were introduced onto BLM lands due to logging?

Page 289, what percent of the planning area was habitat-capable under historic conditions.

Page 297, if the barred owl is competing with spotted owl then wouldn't more habitat be beneficial?

Page 305, isn't logging a primary threat to the marbled murrelet?

Page 335, why is BLM proposing to continue the declines in fish populations?

Page 338, if BLM can contribute to improving fish habitat and the survival of anadromous salmonids, why is BLM electing to reduce fish survival by increasing deforestation under the WOPR?

Page 346, Figure 87, the bar graph should show the mature, structurally complex, existing old forest, and existing very old forest stages separately.

Page 356, since every 1% increase in sediment decreases fish survival 3.4% why does the BLM want to increase sediment and reduce fish survival?

Page 372, why does the BLM want to increase sediment by increasing road building and clear-cutting?

Page 379 and 381, why does the BLM want to increase land slides with more road building and clear-cutting?

Page 388, why does the BLM want to increase peak flood flows by clear-cutting?

Page 393, why does the BLM want to increase fire severity with more clear-cutting?

Page 394, why does the BLM want to reduce fire resiliency and increase uncharacteristic wildfires by liquidating legacy forests?

Page 480, how is it possible to have a range of sustainable logging levels? Why is 100 years considered long-term for a forest?

Page 481, were the models run on the actual first ten years of the NWFP to verify the model?

Page 482, how was the error made regarding the areas open to OHV use? What is the difference between the areas open for OHV use and the areas actually used by OHVs?

Page 484, the cumulative effects analysis should summarize all of the adverse environmental impacts on each land ownership class during the past 100 years.

Page 486, the long-term should be considered to be 500 years, 100 years is medium term.

Page 487, what is the historic rate of wildfires and other disturbances in the planning area? How many arson fires were started by fire fighters who wanted more work and by loggers to justify salvage logging in the planning area? Due to global climate change wildfires will increase according to the USFS. The WOPR should include estimates of future natural and human caused disturbances. Human caused fires during the next century will be related to population increases. Is the BLM saying that disturbances will behave the same under all of the alternatives? The entire WOPR is speculative and arbitrary, so why did that stop the BLM in this context? Reasonably foreseeable estimates of future wildfires and other disturbances can and should be made in the WOPR and used to calculate the sustainable yield and reduce the ASQs correspondingly. The WOPR should analyze how natural and human disturbances will affect the resources under each alternative.

Page 488, the WOPR should disclose which laws the court found that the BLM violated in the Timbered Rock EIS.

Page 489, does salvage logging encourage arson? What impact do bird populations have on insect outbreaks?

Page 490, what percent of the “logging shows” are properly designed and implemented?

Page 491, the decision to ignore global climate change in the WOPR is grossly arbitrary and fatally flawed. There is new information available for the WOPR analysis. The BLM should read the speech by Gail Kimbell, Chief of the USFS, presented on October 24 at The Society of American Foresters 2007 National Convention in Portland. The BLM should also consider her speech “Climate Change, Kids, and Forests: What’s the Connection?” presented at Society of Environmental Journalists, Annual Conference in Stanford, CA on September 7, 2007. The BLM should review the November 2007 United Nations Intergovernmental Panel on Climate Change report. The BLM should read the transcripts of the November 1, 2007 House Select Committee on Energy Independence and Global Warming Subcommittee on Global Climate Change and Wildfires. The WOPR should disclose that the BCF tried to muzzle USFS Chief Kimbell before her House testimony. The WOPR needs to be completely rewritten to account for all of the effects of global climate change in the planning area. Reasonable ranges of the effects of climate change should be projected more than 100 years into the future in order for the BLM to reasonably calculate ASQs 100 years out.

Page 493, Table 149, a column should be added to show the actual implementation of the NWFP during the past decade.

Page 495, Figure 142, the mature, developed structurally complex, existing old forest, and existing very old forest stages should be shown separately in the graphs.

Page 496, Figure 143 and Table 150, the mature, developed structurally complex, existing old forest, and existing very old forest stages should be shown separately in the bar graphs and table.

Pages 502 - 505, Figures 145 – 147, the graphs should show the acreage percentages on the right side.

Page 505, Figure 147, similar drawings and graphs should be created that show the developed structurally complex, existing old forest, and existing very old forest stages separately for each alternative. A drawing and graph set should also be created showing the long-term average historic natural forest conditions through 2106 under the influence of global climate change.

Page 509, Table 151, the existing old forest and existing very old forest stages should be shown separately in the table. The table should also show the actual NWFP implementation rate. Are the acres the same in both columns?

Page 510, how is 19% related to 1% and 2%?

Page 512 - 513, Figures 148 and 149, the developed structurally complex, existing old forest, and existing very old forest stages should be shown separately in the graphs. Graph sets should also be created showing the long-term average historic natural forest conditions through 2106 under the influence of global climate change.

Pages 514 – 516, Figures 150 – 152, the mature, developed structurally complex, existing old forest, and existing very old forest stages should be shown separately in the bar graphs.

Pages 518 – 524, Figures 153 – 156, the developed structurally complex, existing old forest, and existing very old forest stages should be shown separately in the graphs. Graph sets should also be created showing the long-term average historic natural forest conditions through 2106 under the influence of global climate change.

Page 527 - 528, Figure 157 and Table 152, the developed structurally complex, existing old forest, and existing very old forest stages should be shown separately in the bar graph and table.

Page 530 – 533, Figures 158 – 160, the mature, developed structurally complex, existing old forest, and existing very old forest stages should be shown separately in the bar graphs.

Page 535, the BLM should use recreation and tourism as a measure to compare each alternative over the next 100 years. Why would the BLM want to flood the timber market and force low timber prices even lower? Maybe higher stumpage prices would be better.

Page 536 - 537, the WOPR should show a history of log values. What is the logging rate per acre by each alternative? How many acres will be logged each year? BLM should disclose the amount of subsidy that the logging corporations will receive by showing that in Table 154.

Page 539, Figure 161, show the NWFP level and sustainable level (perhaps \$30M) as lines across the bar graph.

Page 540, if BLM logging levels did not cause the decline in plywood production, then why are the corporate ERBs blaming patriotic environmental organizations for closing plywood mills?

Page 541, would logging increase if the economy were in decline? What percent of the logging is on private lands? What sales tax rate would be needed in each county to replace the BLM payments to the counties?

Page 543 - 544, Tables 158 and 159; under the No Action alternative the changes in jobs should all be zero by definition. What would be the change in jobs if logging were restricted to the sustainable rate? Why would logging need to be increased if the plywood industry is in decline? The total employment, total population, unemployment rate, and other economic indexes through the years for each county should also be shown.

Page 547, does the BLM think that increasing clear-cutting will reverse the plywood production decline?

Page 548, as described, other factors affect employment than just clear-cutting on O&C Lands. What is the logging rate on private lands? Will the county economies be more diversified in the future?

Page 549, how will the quality of life be affected by BLM clear-cutting the forests and transforming them into regulated tree farms? Why is it assumed that the BLM budget will increase with more clear-cutting? What would the BLM budget increase need to be if the O&C lands were to be properly managed for sustainable yields and improving the ecosystems? If the BLM were to properly managing the public lands how would the local economies be affected?

Page 550, how much would the BLM budget have to be increased if it were to follow all laws and properly implement the NWFP?

Page 551, how much could the BLM stumpage revenue increase if honest bidding were done for timber sales? How much collusion occurs between timber corporations to drive down stumpage values? What is the subsidy amount provided per mbf to the timber barons?

Page 554, what is the rich Republican population in each county? The WOPR should disclose how much the rich are benefiting under each alternative compared to the poor.

Page 557 - 559, what is the ASQ per acre for each alternative? What is the sustainable yield per acre? How many acres will be clear-cut annually by alternative?

Page 564, Figure 170, it is apparent that Alternative 2 is only an industrial logging alternative. Why does BLM want to manage public land with the same failed industrial short rotation management techniques used by the timber barons?

Page 566, how many more old-growth trees are growing now compared to 10 years ago? Why does the BLM want to eliminate 30% of the riparian reserves by reclassification? Why does BLM want to clear-cut 30% of the riparian reserves? Is BLM suggesting that trees grow faster now than 10 years ago? What was the actual average ASQ under the NWFP during the past 10 years? How will global climate change affect tree growth during the next 100 years?

Page 567, what size of trees will be logged during thinning from the non-harvest land base?

Page 570, why does the BLM want to reduce the age of the forest stands?

Pages 571 - 572, Figures 176 - 179, redo the figures to show logging by 50 year age class bands up to 500 years.

Pages 574 – 575, Figures 182 and 183, the developed structurally complex, existing old forest, and existing very old forest stages should be shown separately in the bar graphs.

Page 577, a minimum stumpage price for bids should be set that are greater than historical prices. What amount of subsidy has the BLM provided to the timber corporations during the past decades?

Page 578, Figure 186, show the sustainable stumpage value.

Pages 579 – 582, Figures 188 – 191, and Tables 170 – 173, redo the figures and tables to show logging by 50 year age class bands up to 500 years. Also show the logging rate in mbf per acre.

Page 586, how many old-growth trees grew up in the past 10 years? Are there more older forests now because the courts stopped the BLM from violating laws? What is a regulated condition, a tree farm without old trees? How old is a regulated tree farm?

Page 587, why do the computer models stop at 100 years if growth continues to increase past 100 years? New canopy research shows that old-growth trees continue to have high growth rates and are more efficient than younger trees. Why does a requirement of maintaining a non-declining logging flow prevent regulation? It appears that BLM intentionally misinterprets the O&C Act and grossly overestimates the sustainable yield. If logging rates were reduced to the actual sustainable yield (something less than the NWFP ASQ) then a non-declining log flow could be achieved. A smaller ASQ is easier to maintain.

The BLM should read the new research from the University of Washington done at the Wind River Experimental Forest. That research has studied the canopies of old-growth trees since 1995 with the only canopy crane in North America. *“It was here that scientists put to rest the myth that mature forests are biologically moribund. By rising above the treetops, they were able to take measurements that showed old forests continue to grow and act as a sink for carbon dioxide, a major greenhouse gas. Studies here also proved it doesn't make sense from a global-warming perspective to cut older forests and replace them with seedlings, which grow faster and had been thought to absorb more carbon dioxide. Old forests are storehouses for such vast amounts of carbon that it would take many decades for new forests to catch up on the carbon balance sheet.”* The BLM should abandon its fascination with regulated forestry and the myth that old-growth trees are decadent.

Pages 587 – 589, Figures 199 – 202, redo the figures to show acres by 50 year age class bars up to 500 years. Also show bars representing the long-term average historic natural conditions under the influence of global climate change on each graph. Why does the BLM want to eliminate most trees over 200 years old in the next 100 years? Is that part of the plan to convert permanent forests into regulated tree farms?

Page 594, how is it possible that no damage or loss of occupied habitat, individual plants, or populations would occur under all alternatives when more than twice as many populations will be subject to clear-cutting tracts as compared to the NWFP? What about the unoccupied habitat? How can species recovery plans be applied over such large areas with such a guarantee?

Page 596, why will BLM only protect populations of 20 or fewer?

Page 609, Table 178, show the No Action alternative in the table too.

Pages 613, 616, 622, and 628, Figures 206, 208, 211, and 214, what do the colors and numbers mean?

Page 635, why does the BLM want half of the spotted owl habitat permanently destroyed?

Page 728, Figure 253, why does the BLM want to cut out 80% of the riparian areas? Why did BLM change the few remaining riparian reserves into management areas?

Page 730, Figure 254, the developed structurally complex, existing old forest, and existing very old forest stages should be shown separately in the graphs. A graph should also be created showing the long-term average historic natural forest conditions through 2106 under the influence of global climate change.

Page 733, how is it possible that all alternatives are essentially the same?

Page 743, how is it possible that peak flows and stream temperatures will not change?

Pages 752, 754, and 756, Figures 266 - 268, the developed structurally complex, existing old forest, and existing very old forest stages should be shown separately in the graphs. A graph should also be created showing the long-term average historic natural forest conditions through 2106 under the influence of global climate change.

Page 765, the fire and fuels analysis should be redone to include the effect of global climate change.

Page 767, tables 213 and 214, the developed structurally complex, existing old forest, and existing very old forest stages should be shown separately in the tables.

Page 768, 769, and 771, Figures 272 – 274, the long-term natural historic forest condition should also be shown in the bar graphs. New graph sets should also be created showing the long-term average historic natural forest conditions through 2106 under the influence of global climate change.

Pages 785 - 787, Tables 220 – 222 and Figure 277, the long-term natural historic forest condition should also be shown in the tables and bar graph.

Page 794, how is it possible to maintain or improve the soils under all alternatives? The WOPR should use the Universal Soil Loss Equation to estimate soil erosion by alternatives and natural historic forest conditions. Global climate change should be considered when calculating the soil erosion rates for the next 100 years.

Page 807, why does the BLM want to degrade important and relevant values? Is degradation sustainability? Why will 1/4 to 1/3 of the ACECs be sacrificed?

Page 808, why will special management attention be removed from so many existing and potential ACECs causing their degradation and loss?

Page 861, forests include more than just trees.

Pages B-947 and B-948, climate change is correctly identified as a factor. The WOPR should be rewritten to disclose the effects of global climate change on the sustainable yield for the next 100 years.

Pages J-1191 – J-1207, the WOPR should disclose the criteria used to designate the OHV designations? Using a specific criteria is required by law. The criteria should consider the distances from houses, noxious weed and disease spread, buffer widths, soils, native and rare plants, vehicle sanitation, fire hazard, noise, water pollution, and recreational conflicts.

Page Q-1513, Figure 333, redo the bar graph and table to show acres by 50 year age class bars up to 500 years. Also show bars and data representing the long-term average historic natural conditions of the forest.

Page Q-1584, Figure 346, what is the reserve volume? Is that where the BLM eats the “seed corn” or the principle?

Page Q-1586, Figure 347, show a growth (yield) curve by 50 year age classes up to 500 years instead of by mixed stand.

Regards,

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Copies: Representatives DeFazio, Hooley, Blumenauer, Wu, and Senator Wyden.
Governor Kulongoski, Josephine County Board of Commissioners, KS Wild, and FSEEE.